

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

UNITED STATES OF AMERICA and	)	
THE STATE OF WISCONSIN,	)	Case Action No. 1:10-CV-00910
	)	Hon. William C. Griesbach
Plaintiffs,	)	
	)	
v.	)	
	)	
NCR CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	

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**[PROPOSED] ORDER DENYING PLAINTIFFS' CIVIL L. R. 7(h) EXPEDITED  
NON-DISPOSITIVE MOTION FOR A PROTECTIVE ORDER REGARDING  
DEFENDANT MENASHA CORPORATION'S NOTICES OF DEPOSITION PURSUANT  
TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

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Pursuant to Federal Rule of Civil Procedure 26(c) and Civil L. R. 37, Plaintiffs' motion is denied. Plaintiffs have failed to meet and confer with Defendants in good faith in violation of Federal Rule of Civil Procedure 26(c)(1) and Civil Local Rule 37. Absent an agreement between the noticing parties and the Plaintiffs, Plaintiffs must produce their Rule 30(b)(6) designees on the dates noticed, not on the same day as a 30(b)(6) designee's fact witness deposition. Absent an agreement between the noticing parties and the Plaintiffs, Plaintiffs must produce a witness in response to Topics 10 of Menasha's Rule 30(b)(6) Notice to the United States and Topic 11 of Menasha's Rule 30(b)(6) Deposition to the State of Wisconsin.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

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William C. Griesbach  
United States District Judge